

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

CASE NO. 97-076-DRD-18

vs.

MIGUEL A. VEGA-COSME,
Defendant-Petitioner.

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U.S. DISTRICT COURT
SAN JUAN, P.R.

MOTION FOR CLARIFICATION OF RECORD
IN RE: APPOINTMENT OF ATTORNEY RAMOS-VEGA

TO THE HONORABLE COURT:

COMES NOW the Defendant Miguel A. Vega-Cosme, pro-se, and hereby respectfully moves this Honorable Court for an Order to correct and/or clarify the record in re: appointment of attorney Hector L. Ramos-Vega [S.A.F.P.D.] in the instant matter. In support thereof, he states as follows:

1. On February 14, 2013, the Defendant filed a motion for sentence reduction pursuant to 18 U.S.C. §3582(c)(2) and U.S.S.G. Amendment #750, and a simultaneous motion for leave to substitute counsel and appear pro-se in re: motion for sentence reduction under 18 U.S.C. §3582(c)(2). (Dockets #1831 & 1832).

2. In compliance with Administrative Directive, Misc. No. 1-437 (ADC), the Clerk issued a scheduling order appointing AFPD Hector L. Ramos-Vega, from the Federal Public Defender Office to appear on Defendant's behalf in this matter. (Docket #1833).
3. On February 27, 2013, the Defendant contacted attorney Ramos-Vega, and established a good relationship with him.
4. Thereafter, on June 18, 2013, attorney Ramos-Vega filed an outstanding memorandum of law in support of Vega-Cosme's requests for sentence reduction and in opposition to the probation officer's recommendation in re: Defendant's §3582(c)(2)-motion, in order to preserve Vega-Cosme's rights. (Docket #1841).
5. Consequently, in light of the excellent memorandum of law that attorney Ramos-Vega filed in support of Defendant's requests for sentence reduction, on July 1, 2013, the Defendant moved the Court for leave to withdraw his motion for leave to appear pro-se, and requested that the Court allowed that attorney Ramos-Vega continued representing the defendant Vega-Cosme in the instant matter. (Docket #1843).
6. On July 19, 2013, the Court entered an Order granting [Docket #1843] Defendant's motion to withdraw [Docket 1831] motion for leave to appear pro-se. (See Docket #1844).
7. However, on December 12, 2013, the Court entered another Order granting [Docket #1834] attorney Ramos-Vega's motion to withdraw as Attorney as to Miguel A. Vega-Cosme (18). (See Docket #1854).

8. Therefore, as the Order [1854] entered on December 16, 2013, is inconsistent with the Order [1844] entered on July 19, 2013, this Honorable Court is Urged to enter an Order to correct and/or clarify the record and allow that attorney Hector L. Ramos-Vega continue representing the defendant Vega-Cosme in the instant matter.
9. It is respectfully submitted that the presence of attorney Ramos-Vega in this matter would enable Vega-Cosme to continue to be effectively represented by an attorney familiar with the background and details of this case, and would also assist this Court in any Status Conference and/or by ensuring that any further pleadings and documents on behalf of Vega-Cosme be properly filed.
10. Furthermore, during recent communications, Mr. Vega-Cosme has requested from attorney Ramos-Vega that, if possible, he continue representing him on this matter and Mr. Ramos-Vega has agreed to continue representing Vega-Cosme herein.

WHEREFORE, in the interest of fairness and justice, the defendant Vega-Cosme respectfully requests that the record be clarify and this Honorable Court allow that attorney Hector L. Ramos-Vega continue representing defendant Vega-Cosme in the instant matter.

March 31, 2014
Date

Respectfully Submitted.

Miguel A. Vega-Cosme

Miguel A. Vega-Cosme, pro-se
Reg. no. 03648-069
FCC Coleman [Med][B-4]
P.O.Box 1032
Coleman, Fl 33521-1032

CERTIFICATE OF PRO-SE COUNSEL

I, Miguel A. Vega-Cosme, pro-se, hereby certify that all the foregoing statements made by me are true and correct to the best of my knowledge and belief. 28 USC §1746.

March 31, 2014

Date

Respectfully Submitted.

Miguel A. Vega-Cosme

Miguel A. Vega-Cosme, pro-se
Reg. no. 03648-069
FCC Coleman [Med][B-4]
P.O.Box 1032
Coleman, FL 33521-1032

CERTIFICATE OF SERVICE

I, Miguel A. Vega-Cosme, pro-se, hereby certify that a true and correct copy of this motion has been mailed via first class mail to the following parties:

U.S. Attorney's Office
Torre Chardon, Ste. 1201
350 Chardon Ave.
San Juan, PR 00918

U.S. Probation Officer
Fed. Bldg. Room 691
150 Chardon Ave.
San Juan, PR 00918

Hector L. Ramos-Vega, AFD
Fed. P. Defender's Office
241 Roosevelt Ave.
San Juan, PR 00918

March 31, 2014

Date

Respectfully Submitted.

Miguel A. Vega-Cosme

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Reg. no. 03648-069
FCC Coleman [Med][B-4]
P.O.Box 1032
Coleman, FL 33521-1032